

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

UNITED STATES OF AMERICA, ) CR-18-00348 LHK  
 )  
 PLAINTIFF, ) SAN JOSE, CALIFORNIA  
 )  
 VS. ) OCTOBER 30, 2019  
 )  
 BRANDON GLOVER, ) PAGES 1-25  
 )  
 DEFENDANT. )  
 \_\_\_\_\_ )

TRANSCRIPT OF PROCEEDINGS  
 BEFORE THE HONORABLE LUCY H. KOH  
 UNITED STATES DISTRICT JUDGE

A P P E A R A N C E S:

FOR THE PLAINTIFF: UNITED STATES ATTORNEY'S OFFICE  
 BY: SUSAN KNIGHT  
 AMIE D. ROONEY  
 150 ALMADEN BOULEVARD, SUITE 900  
 SAN JOSE, CALIFORNIA 95113

FOR THE DEFENDANT: JACHIMOWICZ LAW GROUP  
 BY: ALBIE B. JACHIMOWICZ  
 1530 THE ALAMEDA, SUITE 115  
 SAN JOSE, CALIFORNIA 95126

LAW OFFICES OF CARLEEN R. ARLIDGE  
 BY: CARLEEN R. ARLIDGE  
 111 WEST ST. JOHN STREET, SUITE 555  
 SAN JOSE, CALIFORNIA 95113

OFFICIAL COURT REPORTER: LEE-ANNE SHORTRIDGE, CSR, CRR  
 CERTIFICATE NUMBER 9595

PROCEEDINGS RECORDED BY MECHANICAL STENOGRAPHY  
 TRANSCRIPT PRODUCED WITH COMPUTER

1 SAN JOSE, CALIFORNIA

OCTOBER 30, 2019

2 P R O C E E D I N G S

3 (COURT CONVENED AT 9:57 A.M.)

4 THE COURT: OKAY. LET'S DO --

5 THE CLERK: RECALLING CASE 18-00-348, UNITED STATES  
6 VERSUS BRANDON CHARLES GLOVER.

7 THE COURT: THE DEFENDANTS NEED TO BE ARRAIGNED; IS  
8 THAT CORRECT?

9 MS. KNIGHT: YES, YOUR HONOR.

10 GOOD MORNING, YOUR HONOR.

11 SUSAN KNIGHT FOR THE UNITED STATES.

12 MR. JACHIMOWICZ: AND GOOD MORNING, YOUR HONOR.

13 ALBIE JACHIMOWICZ AND CARLEEN ARLIDGE FOR MR. GLOVER.

14 MR. GLOVER IS PRESENT.

15 MS. ROONEY: AND AMIE ROONEY FOR THE UNITED STATES AS  
16 WELL, YOUR HONOR. THANK YOU.

17 THE COURT: OKAY. GOOD MORNING AND WELCOME.

18 SO WE'RE GOING TO DO EACH DEFENDANT INDIVIDUALLY; IS THAT  
19 CORRECT?

20 MS. KNIGHT: YES, YOUR HONOR. THANK YOU.

21 THE COURT: ALL RIGHT. THAT'S FINE.

22 LET ME GET THE CORRECT PAPERS.

23 ALL RIGHT. HAS THE SUPERSEDING INFORMATION BEEN FILED?

24 MS. KNIGHT: YES, YOUR HONOR, IT WAS FILED THIS  
25 MORNING AND IT HAS BEEN DOCKETED.

1           AND I DID HAND UP A WAIVER OF INDICTMENT FORM FOR EACH  
2           DEFENDANT THAT HAS BEEN SIGNED BY THE DEFENDANT AND THEIR  
3           COUNSEL.

4           THE COURT: ALL RIGHT. LET ME JUST PULL UP THE  
5           PAPERS FOR MR. GLOVER FIRST.

6           (PAUSE IN PROCEEDINGS.)

7           THE COURT: ALL RIGHT. MR. GLOVER, THE PURPOSE OF  
8           COURT TODAY IS TO ADVISE YOU OF YOUR RIGHTS AND TO ADVISE YOU  
9           OF THE CRIMINAL CHARGE IN THE SUPERSEDING INFORMATION, AND THEN  
10          TO TAKE YOUR PLEA OF GUILTY TO THE INFORMATION.

11          DO YOU HAVE A COPY OF THE SUPERSEDING INFORMATION?

12          THE DEFENDANT: YES, YOUR HONOR.

13          THE COURT: OKAY. ALL RIGHT. NOW, THERE'S A FULL  
14          ARRAIGNMENT ADVISING OF RIGHTS AND ADVISING OF THE CHARGE  
15          AND -- DO COUNSEL WAIVE ADVISEMENT OF RIGHTS? BECAUSE IT SEEMS  
16          SILLY OF ME TO ADVISE HIM OF THE RIGHT TO REMAIN SILENT WHEN  
17          HE'S GOING TO ENTER A PLEA OF GUILTY TODAY.

18          MR. JACHIMOWICZ: WE'RE PREPARED TO WAIVE, JUDGE.

19          THE COURT: OKAY. ALL RIGHT.

20          AND I'M NOT GOING TO ADVISE OF THE MAXIMUM AND MINIMUM  
21          PENALTIES AND THE CHARGES AND THEIR ELEMENTS RIGHT NOW SINCE  
22          WE'RE GOING TO DO THAT IN THE CHANGE OF PLEA COLLOQUY. IS THAT  
23          ACCEPTABLE?

24          MR. JACHIMOWICZ: IT IS, YOUR HONOR.

25          THE COURT: OKAY. ALL RIGHT.

1           NOW, MR. GLOVER, DO YOU UNDERSTAND THAT YOU HAVE THE RIGHT  
2           TO BE INVESTIGATED BY A GRAND JURY AND CHARGED BY AN INDICTMENT  
3           RETURNED BY THE GRAND JURY AND SIGNED BY A MAGISTRATE JUDGE?

4           THE DEFENDANT: YES, YOUR HONOR.

5           THE COURT: DO YOU UNDERSTAND THAT BY WAIVING  
6           INDICTMENT, YOU ARE ALLOWING THE GOVERNMENT TO CHARGE YOU  
7           WITHOUT PRESENTING THIS CASE TO A NEUTRAL GRAND JURY?

8           THE DEFENDANT: YES, YOUR HONOR.

9           THE COURT: OKAY. IS THIS YOUR SIGNATURE ON THIS  
10          WAIVER OF INDICTMENT?

11          THE DEFENDANT: YES, YOUR HONOR.

12          THE COURT: DID YOU READ THIS WAIVER OF INDICTMENT?

13          THE DEFENDANT: YES, YOUR HONOR.

14          THE COURT: HAVE YOU HAD ENOUGH TIME TO DISCUSS THIS  
15          WAIVER OF INDICTMENT WITH YOUR ATTORNEYS?

16          THE DEFENDANT: YES, YOUR HONOR.

17          THE COURT: WERE THEY ABLE TO ANSWER YOUR QUESTIONS  
18          ABOUT THIS WAIVER?

19          THE DEFENDANT: YES, YOUR HONOR.

20          THE COURT: OKAY. AND YOU UNDERSTAND YOU'VE BEEN  
21          ACCUSED OF ONE OR MORE OFFENSES PUNISHABLE BY IMPRISONMENT FOR  
22          MORE THAN ONE YEAR?

23          THE DEFENDANT: YES, YOUR HONOR.

24          THE COURT: YOU KNOW, THIS SAYS THAT YOU'VE BEEN  
25          ADVISED IN OPEN COURT OF YOUR RIGHTS AND THE NATURE OF THE

1 PROPOSED CHARGES AGAINST YOU.

2 SO LET ME JUST, FOR PRECAUTION, GO FORWARD WITH YOUR  
3 RIGHTS.

4 YOU UNDERSTAND YOU HAVE THE RIGHT TO REMAIN SILENT? ANY  
5 WORDS YOU CAN SAY CAN BE USED AGAINST YOU, AND IF YOU ALREADY  
6 SPOKE WITH A GOVERNMENT AGENT, YOU DON'T NEED TO SAY ANYTHING  
7 MORE. AND IF YOU START TO SPEAK, YOU MAY STOP IMMEDIATELY.

8 DO YOU UNDERSTAND THAT?

9 THE DEFENDANT: YES, YOUR HONOR.

10 THE COURT: DO YOU UNDERSTAND THAT YOU HAVE THE RIGHT  
11 TO AN ATTORNEY AT EVERY STAGE OF THIS CASE, AND IF YOU CANNOT  
12 AFFORD AN ATTORNEY, THE COURT WOULD APPOINT AN ATTORNEY TO  
13 REPRESENT YOU AT NO COST TO YOU?

14 THE DEFENDANT: YES, YOUR HONOR.

15 THE COURT: IF YOU WOULD LIKE TO SPEAK WITH YOUR  
16 ATTORNEY AT ANY TIME DURING THIS PROCEEDING, PLEASE DO SO.

17 DO YOU UNDERSTAND THAT?

18 THE DEFENDANT: YES, YOUR HONOR.

19 THE COURT: OKAY. ARE YOU A UNITED STATES CITIZEN,  
20 SIR?

21 THE DEFENDANT: YES, YOUR HONOR.

22 THE COURT: OKAY. AND THE CHARGES AGAINST YOU,  
23 THERE'S ACTUALLY ONLY ONE CHARGE IN THE SUPERSEDING  
24 INFORMATION, AND THAT CHARGES YOU WITH CONSPIRACY TO VIOLATE  
25 18 UNITED STATES CODE, SECTIONS 1030 (A) (7) (B) AND (C) (3) (A) IN

1 VIOLATION OF 18 UNITED STATES CODE, SECTION 1030(B), BEGINNING  
2 IN APPROXIMATELY OCTOBER OF 2016, AND CONTINUING TO  
3 APPROXIMATELY JANUARY OF 2017 IN THE NORTHERN DISTRICT OF  
4 CALIFORNIA.

5 DO YOU UNDERSTAND THIS CHARGE?

6 THE DEFENDANT: YES, YOUR HONOR.

7 THE COURT: AND DO YOU WAIVE -- I'M GOING TO GO AHEAD  
8 AND SIGN THE WAIVER OF INDICTMENT AND PROCEED WITH THE CHANGE  
9 OF PLEA. IS THAT ACCEPTABLE TO DEFENSE COUNSEL? WE COULD HAVE  
10 FURTHER ARRAIGNMENT COLLOQUY, BUT --

11 MR. JACHIMOWICZ: IT'S ACCEPTABLE, JUDGE.

12 THE COURT: -- IT SEEMS REPETITIVE.

13 MR. JACHIMOWICZ: AGREED.

14 THE COURT: OKAY.

15 (PAUSE IN PROCEEDINGS.)

16 THE COURT: SO I'VE SIGNED THE WAIVER OF INDICTMENT.  
17 I WILL ASK MS. DIBBLE TO FILE THIS.

18 I WILL ALSO ASK MS. DIBBLE TO PLEASE SWEAR IN MR. GLOVER.

19 THE CLERK: YES, YOUR HONOR.

20 PLEASE RAISE YOUR RIGHT HAND.

21 **(BRANDON GLOVER, DEFENDANT, WAS SWORN.)**

22 THE DEFENDANT: I DO.

23 THE CLERK: THANK YOU.

24 THE COURT: ALL RIGHT. LET ME ALSO ASK MS. ARLIDGE,  
25 DO YOU CONCUR IN MR. GLOVER'S WAIVER OF AN INDICTMENT?

1 MS. ARLIDGE: YOUR HONOR, I BELIEVE THAT'S MY  
2 SIGNATURE ON THE FORM, SO I DO CONCUR.

3 THE COURT: ALL RIGHT. THANK YOU.

4 OKAY. MR. GLOVER, I HAVE SOME QUESTIONS TO ASK YOU. IF  
5 YOU NEED ME TO REPEAT OR EXPLAIN ANYTHING, WOULD YOU PLEASE LET  
6 ME KNOW?

7 THE DEFENDANT: YES, YOUR HONOR.

8 THE COURT: AND AS I SAID BEFORE, IF YOU NEED TO  
9 SPEAK WITH YOUR ATTORNEY BEFORE ANSWERING ANY QUESTION, WOULD  
10 YOU PLEASE DO SO?

11 THE DEFENDANT: YES, YOUR HONOR.

12 THE COURT: YOU'VE TAKEN THE OATH, WHICH IS A PROMISE  
13 TO TELL THE TRUTH. IF YOU MAKE ANY STATEMENT TODAY THAT'S NOT  
14 TRUE, THE GOVERNMENT CAN USE THAT STATEMENT TO PROSECUTE YOU  
15 FOR PERJURY.

16 DO YOU UNDERSTAND THAT?

17 THE DEFENDANT: YES, YOUR HONOR.

18 THE COURT: WHAT IS YOUR TRUE NAME?

19 THE DEFENDANT: BRANDON CHARLES GLOVER.

20 THE COURT: HOW OLD ARE YOU?

21 THE DEFENDANT: TWENTY-SIX.

22 THE COURT: WHAT IS THE HIGHEST LEVEL OF SCHOOLING  
23 YOU ATTENDED?

24 THE DEFENDANT: TENTH GRADE.

25 THE COURT: DID YOU READ YOUR PLEA AGREEMENT?

1 THE DEFENDANT: YES, YOUR HONOR.

2 THE COURT: DO YOU UNDERSTAND YOUR PLEA AGREEMENT?

3 THE DEFENDANT: YES, YOUR HONOR.

4 THE COURT: HAVE YOU HAD ENOUGH TIME TO DISCUSS YOUR  
5 PLEA AGREEMENT WITH YOUR ATTORNEY?

6 THE DEFENDANT: YES, YOUR HONOR.

7 THE COURT: HAS YOUR ATTORNEY BEEN ABLE TO ANSWER  
8 YOUR QUESTIONS ABOUT YOUR PLEA AGREEMENT?

9 THE DEFENDANT: YES, YOUR HONOR.

10 THE COURT: HAVE YOU HAD ENOUGH TIME TO DISCUSS WITH  
11 YOUR ATTORNEYS WHETHER YOU SHOULD GO TO TRIAL AND WHAT YOUR  
12 DEFENSES MIGHT BE?

13 THE DEFENDANT: YES, YOUR HONOR.

14 THE COURT: ARE YOU SATISFIED WITH THE SERVICES THAT  
15 YOUR ATTORNEYS HAVE PROVIDED TO YOU?

16 THE DEFENDANT: YES, YOUR HONOR.

17 THE COURT: OTHER THAN THE PROMISES CONTAINED IN THE  
18 PLEA AGREEMENT, HAS ANYONE ELSE PROMISED YOU ANYTHING IF YOU  
19 PLEAD GUILTY TODAY?

20 THE DEFENDANT: NO, YOUR HONOR.

21 THE COURT: HAS ANYONE MADE ANY THREATS AGAINST YOU  
22 IN ORDER TO GET YOU TO PLEAD GUILTY?

23 THE DEFENDANT: NO, YOUR HONOR.

24 THE COURT: IS YOUR DECISION TO PLEAD GUILTY FREE AND  
25 VOLUNTARY?



1 THE DEFENDANT: YES, YOUR HONOR.

2 THE COURT: HAVE YOU TAKEN ANY DRUG OR MEDICATION  
3 THAT AFFECTS YOUR ABILITY TO UNDERSTAND WHAT IS HAPPENING?

4 THE DEFENDANT: NO, YOUR HONOR.

5 THE COURT: ALL RIGHT.

6 WOULD YOU PLEASE STATE THE ELEMENTS THAT THE GOVERNMENT  
7 WOULD HAVE TO PROVE BEYOND A REASONABLE DOUBT AT TRIAL IN ORDER  
8 FOR MR. GLOVER TO BE CONVICTED OF COUNT ONE OF THE SUPERSEDING  
9 INFORMATION?

10 MS. KNIGHT: YES, YOUR HONOR. THANK YOU.

11 MR. GLOVER HAS BEEN CHARGED WITH CONSPIRACY TO VIOLATE  
12 18 UNITED STATES CODE, SECTIONS 1030 (A) (7) (B) AND (C) (3) (A),  
13 EXTORTION INVOLVING COMPUTERS, IN VIOLATION OF TITLE 18  
14 UNITED STATES CODE, SECTION 1030 (B) .

15 THE ELEMENTS OF THIS OFFENSE ARE AS FOLLOWS:

16 BEGINNING IN APPROXIMATELY OCTOBER OF 2016 AND CONTINUING  
17 THROUGH AT LEAST JANUARY 2017, THE DEFENDANT ENTERED INTO AN  
18 AGREEMENT WITH ANOTHER INDIVIDUAL TO COMMIT AN OFFENSE UNDER  
19 18 UNITED STATES CODE, SECTIONS 1030 (A) (7) (B) AND (C) (3) (A),  
20 EXTORTION INVOLVING COMPUTERS, IN VIOLATION OF 18 U.S.C.,  
21 SECTION 1030 (B) .

22 THE DEFENDANT BECAME A MEMBER OF THE CONSPIRACY KNOWING OF  
23 AT LEAST ONE OF ITS OBJECTS AND INTENDING TO HELP ACCOMPLISH  
24 IT.

25 THE ELEMENTS OF 18 UNITED STATES CODE, SECTIONS

1 1030 (A) (7) (B) AND (C) (3) (A), EXTORTION INVOLVING COMPUTERS, ARE  
2 AS FOLLOWS:

3 THE DEFENDANT ACTED WITH THE INTENT TO EXTORT FROM ANY  
4 PERSON ANY MONEY OR ANY OTHER THING OF VALUE; AND BY  
5 TRANSMITTING IN INTERSTATE OR FOREIGN COMMERCE A COMMUNICATION  
6 CONTAINING A THREAT TO IMPAIR THE CONFIDENTIALITY OF  
7 INFORMATION OBTAINED FROM A PROTECTED COMPUTER WITHOUT  
8 AUTHORIZATION OR BY EXCEEDING AUTHORIZED ACCESS.

9 THE COURT: MR. GLOVER, DO YOU UNDERSTAND THE  
10 ELEMENTS THE GOVERNMENT WOULD HAVE TO PROVE BEYOND A REASONABLE  
11 DOUBT AT TRIAL?

12 THE DEFENDANT: YES, YOUR HONOR.

13 THE COURT: WOULD YOU PLEASE STATE THE MAXIMUM  
14 PENALTIES PROVIDED BY LAW?

15 MS. KNIGHT: YES, YOUR HONOR.

16 THE MAXIMUM PENALTIES ARE UP TO FIVE YEARS IN PRISON; A  
17 FINE OF \$250,000, THAT'S A MAXIMUM FINE; THREE YEARS OF  
18 SUPERVISED RELEASE; RESTITUTION THAT IS TO BE DETERMINED BY THE  
19 COURT AT A LATER DATE; AND A \$100 SPECIAL ASSESSMENT. THERE'S  
20 ALSO FORFEITURE IN THIS MATTER.

21 THE COURT: OKAY.

22 MR. GLOVER, I SAY THIS TO EVERY SINGLE DEFENDANT. IF YOU  
23 ARE NOT A U.S. CITIZEN, AS A RESULT OF THIS CONVICTION, YOU MAY  
24 BE DEPORTED FROM THE UNITED STATES AND SUFFER OTHER IMMIGRATION  
25 CONSEQUENCES.

1 DO YOU UNDERSTAND THE MAXIMUM PENALTIES PROVIDED BY LAW?

2 THE DEFENDANT: YES, YOUR HONOR.

3 THE COURT: OKAY. NEXT I'M GOING TO ASK YOU ABOUT  
4 RIGHTS THAT YOU HAVE.

5 DO YOU UNDERSTAND THAT YOU HAVE THE RIGHT TO A JURY TRIAL?

6 THE DEFENDANT: YES, YOUR HONOR.

7 THE COURT: DO YOU GIVE UP THAT RIGHT?

8 THE DEFENDANT: YES, YOUR HONOR.

9 THE COURT: DO YOU UNDERSTAND THAT YOU HAVE THE RIGHT  
10 TO PLEAD NOT GUILTY AND TO REQUIRE THE GOVERNMENT TO PROVE YOUR  
11 GUILT BEYOND A REASONABLE DOUBT AT TRIAL?

12 THE DEFENDANT: YES, YOUR HONOR.

13 THE COURT: DO YOU GIVE UP THAT RIGHT?

14 THE DEFENDANT: YES, YOUR HONOR.

15 THE COURT: DO YOU UNDERSTAND THAT YOU HAVE THE RIGHT  
16 TO BE REPRESENTED BY A LAWYER AT TRIAL AND AT ALL STAGES OF  
17 THESE PROCEEDINGS?

18 THE DEFENDANT: YES, YOUR HONOR.

19 THE COURT: DO YOU UNDERSTAND THAT IF YOU COULD NOT  
20 AFFORD A LAWYER, THE COURT WOULD APPOINT A LAWYER TO REPRESENT  
21 YOU AT NO COST TO YOU?

22 THE DEFENDANT: YES, YOUR HONOR.

23 THE COURT: DO YOU UNDERSTAND THAT YOU HAVE THE RIGHT  
24 AT TRIAL TO SEE, HEAR, AND ASK QUESTIONS OF WITNESSES AGAINST  
25 YOU?

1 THE DEFENDANT: YES, YOUR HONOR.

2 THE COURT: DO YOU GIVE UP THAT RIGHT?

3 THE DEFENDANT: YES, YOUR HONOR.

4 THE COURT: DO YOU UNDERSTAND THAT YOU HAVE THE RIGHT  
5 TO TESTIFY AND PRESENT EVIDENCE IN YOUR DEFENSE AT TRIAL?

6 THE DEFENDANT: YES, YOUR HONOR.

7 THE COURT: DO YOU GIVE UP THAT RIGHT?

8 THE DEFENDANT: YES, YOUR HONOR.

9 THE COURT: DO YOU UNDERSTAND THAT YOU HAVE THE RIGHT  
10 TO REMAIN SILENT, NOT TO TESTIFY, NOT TO PRESENT ANY EVIDENCE  
11 OR A DEFENSE?

12 THE DEFENDANT: YES, YOUR HONOR.

13 THE COURT: DO YOU GIVE UP THAT RIGHT?

14 THE DEFENDANT: YES, YOUR HONOR.

15 THE COURT: DO YOU UNDERSTAND THAT YOU HAVE THE RIGHT  
16 TO CALL WITNESSES TO COME TO TRIAL TO TESTIFY ON YOUR BEHALF  
17 AND TO HAVE THE COURT ORDER WITNESSES TO COME TO COURT TO  
18 TESTIFY?

19 THE DEFENDANT: YES, YOUR HONOR.

20 THE COURT: DO YOU GIVE UP THAT RIGHT?

21 THE DEFENDANT: YES, YOUR HONOR.

22 THE COURT: DO YOU UNDERSTAND THAT IF YOU WERE TO GO  
23 TO TRIAL AND TO BE CONVICTED, YOU WOULD HAVE THE RIGHT TO  
24 APPEAL YOUR CONVICTION, THE JUDGMENT, YOUR SENTENCE, AND ANY  
25 ORDERS MADE BY THE COURT?

1 THE DEFENDANT: YES, YOUR HONOR.

2 THE COURT: DO YOU UNDERSTAND THAT IN PARAGRAPH 4 OF  
3 YOUR PLEA AGREEMENT, YOU HAVE GIVEN UP YOUR RIGHT TO APPEAL  
4 YOUR CONVICTION, THE JUDGMENT, ALL ORDERS OF THE COURT, ANY  
5 ASPECT OF YOUR SENTENCE, INCLUDING RESTITUTION AND FORFEITURE,  
6 BUT YOU HAVE KEPT THE RIGHT TO CLAIM THAT YOUR COUNSEL WAS NOT  
7 EFFECTIVE IN REPRESENTING YOU?

8 THE DEFENDANT: YES, YOUR HONOR.

9 THE COURT: DO YOU UNDERSTAND THAT YOU HAVE THE RIGHT  
10 TO FILE OTHER TYPES OF MOTIONS OR PETITIONS ATTACKING ORDERS  
11 MADE BY THE COURT, YOUR CONVICTION, AND YOUR SENTENCE?

12 THE DEFENDANT: YES, YOUR HONOR.

13 THE COURT: DO YOU UNDERSTAND THAT IN PARAGRAPH 5 OF  
14 YOUR PLEA AGREEMENT, YOU AGREE NOT TO FILE ANY COLLATERAL  
15 ATTACK ON YOUR CONVICTION OR YOUR SENTENCE, INCLUDING A  
16 PETITION UNDER 28 UNITED STATES CODE, SECTION 2255 OR 2241, BUT  
17 YOU HAVE KEPT THE RIGHT TO CLAIM THAT YOUR LAWYER WAS NOT  
18 EFFECTIVE IN REPRESENTING YOU?

19 YOU ALSO AGREE NOT TO SEEK RELIEF UNDER 18 U.S.C.,  
20 SECTION 3582.

21 THE DEFENDANT: YES, YOUR HONOR.

22 THE COURT: WOULD YOU PLEASE STATE THE GOVERNMENT'S  
23 OFFER OF PROOF?

24 MS. KNIGHT: YES, YOUR HONOR. THANK YOU.

25 IF THIS CASE WERE TO PROCEED TO TRIAL, THE GOVERNMENT

1 WOULD BE PREPARED TO PROVE BEYOND A REASONABLE DOUBT THE  
2 FOLLOWING:

3 FROM APPROXIMATELY OCTOBER 2016 AND CONTINUING THROUGH  
4 APPROXIMATELY JANUARY 2017, THE DEFENDANT ENGAGED IN A  
5 CONSPIRACY WITH VASILE MEREACRE AND OTHERS TO USE STOLEN  
6 CREDENTIALS IN ORDER TO ILLEGALLY OBTAIN CONFIDENTIAL DATABASES  
7 AND OTHER DATA BELONGING TO NUMEROUS VICTIM CORPORATIONS FROM  
8 THEIR AMAZON WEB SERVICES ACCOUNTS. SPECIFICALLY, THE  
9 DEFENDANT POSSESSED STOLEN USER DATA, AND USED A CUSTOM-BUILT  
10 GITHUB ACCOUNT CHECKER TOOL TO DETERMINE IF THE STOLEN DATA WAS  
11 ALSO USED AS GITHUB ACCOUNT CREDENTIALS.

12 THE DEFENDANT THEN IDENTIFIED VALID GITHUB ACCOUNT  
13 CREDENTIALS FOR CORPORATE EMPLOYEES AND ACCESSED SEVERAL  
14 ACCOUNTS BELONGING TO THE EMPLOYEES TO SEARCH FOR AMAZON WEB  
15 SERVICES CREDENTIALS. ONCE HE FOUND THE AMAZON WEB SERVICES  
16 CREDENTIALS, HE IMMEDIATELY USED THEM TO ACCESS THE AMAZON WEB  
17 SERVICES SIMPLE STORAGE SERVICES, COMMONLY KNOWN AS S3, TO  
18 SEARCH FOR AND DOWNLOAD SENSITIVE DATA.

19 THE DEFENDANT POSSESSED AND CONTROLLED THE DATA IN ORDER  
20 TO INDUCE PAYMENTS FROM THE VICTIM CORPORATIONS AND KNEW THAT  
21 THE VICTIM CORPORATIONS, SEVERAL OF WHOM WERE HEADQUARTERED IN  
22 THE NORTHERN DISTRICT OF CALIFORNIA, WOULD SUSTAIN ECONOMIC  
23 LOSSES AND DAMAGE TO THEIR REPUTATIONS IF THE DATA WERE TO BE  
24 PUBLICLY DISCLOSED.

25 IN ORDER TO INDUCE PAYMENTS, THE DEFENDANTS, MR. GLOVER

1 AND MR. MEREACRE, CONTACTED THE VICTIM CORPORATIONS USING AN  
2 ALIAS AND AN ENCRYPTED E-MAIL ACCOUNT, SPECIFICALLY, DEFENDANT  
3 MEREACRE USED THE E-MAIL ADDRESS JOHNDOUGHES@PROTONMAIL.COM TO  
4 CONTACT THE VICTIM CORPORATIONS TO REPORT A SECURITY  
5 VULNERABILITY AND DEMAND PAYMENT IN EXCHANGE FOR DELETION OF  
6 THE DATA.

7 THOUGH MR. MEREACRE, DEFENDANT MEREACRE, WAS THE PRIMARY  
8 DRAFTER OF THE MESSAGES SENT FROM THE JOHNDOUGHES ACCOUNT, THE  
9 DEFENDANT CONSULTED WITH HIM AND HELPED HIM DECIDE WHAT TO SAY.

10 THE DEFENDANT UNDERSTANDS AND AGREES THAT THE E-MAILS TO  
11 AND FROM THE JOHNDOUGHES ACCOUNT WERE TRANSMISSIONS IN  
12 INTERSTATE COMMERCE.

13 ON ONE OCCASION, DEFENDANTS GLOVER AND MEREACRE INFORMED A  
14 VICTIM CORPORATION THAT THEY HAD BEEN PAID BY ANOTHER VICTIM  
15 CORPORATION FOR IDENTIFYING SECURITY VULNERABILITIES.

16 THEY ALSO SENT THE VICTIM CORPORATIONS A SAMPLE OF THE  
17 DATA IN ORDER FOR THE VICTIM CORPORATIONS TO VERIFY THE  
18 AUTHENTICITY OF THE DATA. AFTER EXAMINING THE SAMPLE DATA, THE  
19 VICTIM CORPORATIONS COMMUNICATED WITH THEM ABOUT A PAYMENT IN  
20 EXCHANGE FOR DELETION OF THE DATA. IN SOME INSTANCES, THE  
21 VICTIM CORPORATIONS INSTRUCTED THE DEFENDANTS TO REGISTER WITH  
22 HACKERONE. HACKERONE IS A SAN FRANCISCO-BASED COMPANY THAT  
23 OPERATES BUG BOUNTY PROGRAMS FOR CORPORATIONS. BUG BOUNTY  
24 PROGRAMS ARE SERVICES WHEREIN INDIVIDUALS REPORT SECURITY  
25 VULNERABILITIES AND RECEIVE RECOGNITION AND COMPENSATION. EACH

1 CORPORATION ESTABLISHES THE RULES AND REGULATIONS OF ITS BUG  
2 BOUNTY PROGRAM.

3 IN OTHER INSTANCES, THE VICTIM CORPORATIONS STOPPED  
4 COMMUNICATING WITH THE DEFENDANTS AND DID NOT PAY THEM FOR THE  
5 DATA.

6 THE DEFENDANTS TARGETED THE FOLLOWING COMPANIES:

7 NUMBER 1. UBER. AS PART OF THE CONSPIRACY, ON OR ABOUT  
8 NOVEMBER 14, 2016, THE DEFENDANTS E-MAILED THE CHIEF SECURITY  
9 OFFICER AT UBER AT THE TIME, USING THE JOHNDOUGHES ACCOUNT.  
10 THEY CLAIMED TO HAVE, QUOTE, "FOUND A MAJOR VULNERABILITY IN  
11 UBER, 1," OR I, "WAS ABLE TO DUMP UBER DATABASE AND MANY OTHER  
12 THINGS," END QUOTE.

13 IN FACT, THE DEFENDANTS HAD NOT DISCOVERED A VULNERABILITY  
14 DIRECTLY IN UBER'S SOFTWARE, BUT HAD ILLEGALLY ACCESSED AND  
15 DOWNLOADED 57 MILLION RECORDS CONSISTING OF UBER CUSTOMER DATA  
16 AND UBER DRIVER DATA FROM AMAZON'S WEB SERVICES ACCOUNT.

17 UBER REPLIED TO THE DEFENDANTS' MESSAGE THE SAME DAY,  
18 BEGINNING AN E-MAIL CORRESPONDENCE THAT WOULD EXTEND THROUGH  
19 MID-JANUARY OF 2017.

20 ON NOVEMBER 14TH, 2016, THE DEFENDANTS PROVIDED A SNIPPET  
21 OF THE DATABASE THAT THEY HAD OBTAINED AS PROOF OF THE DATA  
22 EXFILTRATION. UBER CONFIRMED IT WAS UBER'S DATA.

23 IN RESPONSE, THE DEFENDANTS WROTE, QUOTE, "KEEP IN MIND  
24 THIS IS NOT THE ONLY THINGS I FOUND. I CAN NAME 100 DIFFERENT  
25 MORE THINGS I FOUND. ME AND MY TEAM EXPECT A HIGH COMPENSATION



1 FOR THIS," END QUOTE.

2 WHEN UBER SAID THAT ITS MAXIMUM BOUNTY AMOUNT WAS  
3 GENERALLY \$10,000, THEY REPLIED, QUOTE, "OUR MINIMUM IS 6  
4 DIGITS," END QUOTE. UBER AGREED, ON OR ABOUT NOVEMBER 16,  
5 2016, TO MAKE A \$100,000 PAYMENT IN BITCOIN THROUGH THE  
6 HACKERONE BUG BOUNTY PROGRAM.

7 THEY REGISTERED ON HACKERONE TO ACCEPT THE PAYMENT, USING  
8 THE E-MAIL ADDRESS WILLIAMLOAFMANN@GMAIL.COM.

9 BEFORE MAKING THE PAYMENT, UBER WANTED THE DEFENDANTS TO  
10 SIGN A CONFIDENTIALITY AGREEMENT THAT REQUIRED THEM TO DESTROY  
11 THE DATA THEY HAD STOLEN. THE DEFENDANTS INSTRUCTED UBER TO  
12 SEND THE PROPOSED AGREEMENT TO BOTH THE JOHNDOUGHES AND  
13 SPORTSTICKETS7@GMAIL.COM ACCOUNTS.

14 UBER WANTED THE DEFENDANTS TO SIGN THE CONFIDENTIALITY  
15 AGREEMENTS USING THEIR TRUE NAMES, AND FOR APPROXIMATELY THREE  
16 WEEKS, THEY NEGOTIATED THAT AND OTHER TERMS.

17 BY DECEMBER 5TH, 2016, THE DEFENDANTS WERE FRUSTRATED AND  
18 SENT AN E-MAIL THAT STATED IN RELEVANT PART, QUOTE, "PLEASE  
19 KEEP IN MIND, THAT THE CONTRACT STATES ALL DATA WILL BE DELETED  
20 ONCE THE MONEY IS PAID. THE BALL IS IN YOUR COURT," END QUOTE.  
21 UBER PAID THE DEFENDANTS THE MONEY IN TWO \$50,000 INSTALLMENTS,  
22 ONE ON DECEMBER 8TH AND ONE ON DECEMBER 14TH, 2016.

23 BY JANUARY 2017, UBER INFORMED THE DEFENDANTS THAT THEY  
24 HAD DISCOVERED THEIR TRUE -- THEY HAD DISCOVERED THEIR TRUE  
25 IDENTITIES, INCLUDING, AS IT STATES HERE, MR. GLOVER'S.

1 MR. GLOVER MET WITH A REPRESENTATIVE FROM UBER AT HIS  
2 RESIDENCE IN FLORIDA ON JANUARY 3RD, 2017, ADMITTED HIS ROLE IN  
3 THE DATE BREACH EXFILTRATION, AND SIGNED A CONFIDENTIALITY  
4 AGREEMENT. THE AGREEMENT REQUIRED THE DEFENDANT TO, AMONG  
5 OTHER THINGS, QUOTE, "PROMISE THAT" HE, "THAT I HAVE NOT AND  
6 WILL NOT DISCLOSE ANYTHING ABOUT THE VULNERABILITIES OR MY  
7 DIALOGUE WITH UBER TO ANYONE FOR ANY PURPOSE WITHOUT UBER'S  
8 WRITTEN PERMISSION," END QUOTE, AND, QUOTE, "PROMISE THAT I DID  
9 NOT TAKE OR STORE ANY DATA DURING OR THROUGH MY RESEARCH AND  
10 THAT I HAVE DELIVERED TO UBER OR FORENSICALLY DESTROYED ALL  
11 INFORMATION ABOUT AND/OR ANALYSIS OF THE VULNERABILITIES," END  
12 QUOTE.

13 FURTHERMORE, WHILE UBER ULTIMATELY OBTAINED  
14 CONFIDENTIALITY AGREEMENTS FROM MR. GLOVER AND MR. MEREACRE,  
15 NEITHER MR. MEREACRE OR MR. GLOVER EVER DISCLOSED TO UBER THAT  
16 A THIRD INDIVIDUAL, REFERRED TO AS INDIVIDUAL ONE, WAS INVOLVED  
17 IN THE UBER DATA BREACH. MEREACRE SHARED UBER'S AMAZON WEB  
18 SERVICES CREDENTIALS WITH INDIVIDUAL ONE, WHICH ALLOWED HIM TO  
19 ACCESS UBER'S AMAZON WEB SERVICES ACCOUNT. INDIVIDUAL ONE IS A  
20 TECHNICALLY PROFICIENT HACKER, AND HE WAS RESPONSIBLE FOR  
21 IDENTIFYING THE SPECIFIC ARCHIVE FILE THAT CONTAINED THE  
22 57 MILLION USER RECORDS.

23 MEREACRE AND GLOVER, THE DEFENDANTS, AGREED TO SPLIT THE  
24 \$100,000 PAYMENT WITH INDIVIDUAL ONE IN LIGHT OF HIS  
25 CONTRIBUTION.

1           IN THE COURSE OF HIS PARTICIPATION, INDIVIDUAL ONE  
2           OBTAINED A COPY OF THE ARCHIVE FILE CONTAINING UBER'S USER  
3           RECORDS. THE DEFENDANTS REQUESTED THAT INDIVIDUAL ONE DELETE  
4           HIS COPY, WHICH HE SAID HE WOULD DO, BUT THE DEFENDANT CANNOT  
5           BE CERTAIN THAT HE DID SO.

6           THE SECOND CORPORATION AFFECTED IS LYNDACOM.

7           AS PART OF THE CONSPIRACY, ON DECEMBER 11TH, 2016, THE  
8           DEFENDANTS E-MAILED THE SECURITY TEAM AT LINKEDIN USING THE  
9           JOHNDOUGHS ACCOUNT TO NOTIFY THE COMPANY, WHICH OWNS LYNDACOM,  
10          THAT THEY FOUND A SECURITY FLAW COMPROMISING -- COMPROMISING  
11          DATABASES OF LYNDACOM, ALONG WITH CREDIT CARD PAYMENTS AND  
12          MUCH MORE.

13          THE DEFENDANTS WERE WELL AWARE THAT THERE WAS NOT A  
14          SECURITY FLAW AND THAT, IN FACT, THEY POSSESSED OVER 90,000  
15          CONFIDENTIAL LYNDACOM USER ACCOUNTS THAT WERE ILLEGALLY  
16          ACCESSED AND DOWNLOADED FROM LYNDACOM'S AMAZON WEB SERVICES  
17          ACCOUNT.

18          A FEW HOURS LATER, A MEMBER OF LINKEDIN'S SECURITY TEAM  
19          RESPONDED TO THE DEFENDANTS FOR AN EXPLANATION OF THE ALLEGED  
20          VULNERABILITY. THE DEFENDANTS RESPONDED WITH THE FOLLOWING  
21          E-MAIL AND ATTACHED A SAMPLE OF THE DATA: QUOTE, "BEFORE I  
22          CONTINUE, I WOULD LIKE TO SAY THAT THIS DOES NOT LOOK GOOD, I  
23          WAS ABLE TO ACCESS BACKUPS UPON BACKUPS, ME AND MY TEAM WOULD  
24          LIKE A HUGE REWARD FOR THIS. THE THINGS WE FOUND WERE SOME OF  
25          THE FOLLOWING, LYNDACOM DATABASE, E-MAIL NAMES ADDRESSES,

1       USERNAMES, SOME PASSWORDS, PAYMENTS, WE ALSO FOUND BACKEND CODE  
2       AND MANY MORE. WE ALSO FOUND PARTIAN LINKEDIN FILES. BEFORE I  
3       CONTINUE, I WOULD LIKE TO ASK THAT YOU GUYS WILL PROMISE TO  
4       COMPENSATE FOR THIS FIND."

5               THE SECURITY TEAM MEMBER AND THE JOHNDOUGHES ACCOUNT  
6       CONTINUED TO COMMUNICATE ABOUT THE LYNDACOM DATABASE, AND THE  
7       LINKEDIN EXECUTIVE INVITED THE JOHNDOUGHES ACCOUNT TO JOIN  
8       LINKEDIN'S BUG BOUNTY PROGRAM THROUGH HACKERONE.

9               AFTER THE INVITATION TO JOIN HACKERONE WAS EXTENDED, THE  
10      DEFENDANTS E-MAILED THE SECURITY TEAM MEMBER USING THE  
11      JOHNDOUGHES ACCOUNT TO INFORM HIM THAT, QUOTE, "PLEASE KEEP IN  
12      MIND, WE EXPECT A BIG PAYMENT AS THIS WAS HARD WORK FOR US, WE  
13      ALREADY HELPED A BIG CORP WHICH PAID CLOSE TO 7 DIGITS, ALL  
14      WENT WELL," END QUOTE.

15              THE DEFENDANTS THEN ESTABLISHED AN ACCOUNT WITH HACKERONE  
16      USING THE FALSE NAME WILLIAM LOAFMANN AND PROVIDED FALSE  
17      INFORMATION ON THE FORMS, AND CONTINUED TO COMMUNICATE WITH  
18      LINKEDIN USING THE HACKERONE COMMUNICATION PLATFORM.

19              THE DEFENDANTS STOPPED COMMUNICATING WITH LINKEDIN ON  
20      APPROXIMATELY JANUARY 16, 2017. THE COMPANY DID NOT PAY THE  
21      DEFENDANTS FOR THE DATA OR FOR CONFIDENTIALITY.

22              THE COURT: MR. GLOVER, DID YOU HEAR AND UNDERSTAND  
23      THE FACTS THE GOVERNMENT IS PREPARED TO PROVE?

24              THE DEFENDANT: YES, YOUR HONOR.

25              THE COURT: ARE THOSE FACTS TRUE AND CORRECT?

1 THE DEFENDANT: YES, YOUR HONOR.

2 THE COURT: WHAT IS YOUR PLEA TO THE SUPERSEDING  
3 INFORMATION WHICH ALLEGES THAT BEGINNING IN APPROXIMATELY  
4 OCTOBER 2016 AND CONTINUING TO APPROXIMATELY JANUARY 2017, IN  
5 THE NORTHERN DISTRICT OF CALIFORNIA AND ELSEWHERE, YOU  
6 CONSPIRED TO VIOLATE 18 U.S. CODE, SECTIONS 1030(A) (7) (B) AND  
7 (C) (3) (A), IN VIOLATION OF 18 U.S. CODE, SECTION 1030(B)?

8 THE DEFENDANT: GUILTY, YOUR HONOR.

9 THE COURT: LET ME ASK COUNSEL, MR. JACHIMOWICZ AND  
10 MS. ARLIDGE, IF YOU CONCUR IN MR. GLOVER'S WAIVER OF RIGHTS AND  
11 ENTRY OF A GUILTY PLEA TO THE SUPERSEDING INFORMATION?

12 MS. ARLIDGE: YOUR HONOR, YES.

13 BUT THERE'S ONE ISSUE THAT I'D LIKE TO JUST PUT ON THE  
14 RECORD, THAT WITH RESPECT -- THE PLEA AGREEMENT TALKS ABOUT  
15 FORFEITURE, WHICH IS AN ELEMENT -- AN ASPECT THAT MR. GLOVER  
16 HAS AGREED TO.

17 WE HAVE AN AGREEMENT WITH THE GOVERNMENT THAT THE MONEY  
18 FORFEITED CAN BE APPLIED, OR WILL BE APPLIED TO RESTITUTION  
19 FIRST.

20 THE COURT: HAS HE ALREADY FORFEITED THE 50,000?

21 MS. KNIGHT: NOT YET, YOUR HONOR.

22 THE COURT: OKAY. ARE YOU JUST PLACING THAT ON THE  
23 RECORD? OR IS THERE ANYTHING YOU'RE REQUESTING FROM ME?

24 MS. ARLIDGE: NO, I'M JUST -- IT WASN'T IN WRITING.

25 THE COURT: OH.

1 MS. ARLIDGE: AND I JUST WANTED TO HAVE THAT -- LET  
2 THE COURT KNOW THAT WE HAVE THE AGREEMENT THAT THE MONEY WOULD  
3 BE APPLIED TOWARD RESTITUTION FIRST.

4 THE COURT: OKAY. AND MY UNDERSTANDING IS THAT THAT  
5 MONEY DOES GO TO RESTITUTION FIRST GENERALLY. IS THAT CORRECT?

6 MS. KNIGHT: YOUR HONOR, I BELIEVE IT MIGHT.

7 BUT WE ARE AGREEING TO IT, AND THE FORFEITURE OF \$50,000  
8 WILL BE APPLIED TO ANY -- TO THE RESTITUTION ORDER IF THERE IS  
9 ONE.

10 THE COURT: ALL RIGHT. YOU DO CONCUR IN THE WAIVER  
11 OF RIGHTS AND ENTRY OF GUILTY PLEA TO THE SUPERSEDING  
12 INFORMATION; CORRECT?

13 MS. ARLIDGE: I DO, YOUR HONOR, YES.

14 MR. JACHIMOWICZ: YES, I DO.

15 THE COURT: ALL RIGHT. THE COURT ACCEPTS THE PLEA  
16 AND FINDS THAT MR. GLOVER HAS MADE A KNOWING, INTELLIGENT, FREE  
17 AND VOLUNTARY WAIVER OF RIGHTS AND ENTRY OF A GUILTY PLEA TO  
18 THE SUPERSEDING INFORMATION. THERE IS AN INDEPENDENT FACTUAL  
19 BASIS FOR EACH ELEMENT OF THE OFFENSE.

20 I AM REFERRING THIS MATTER TO THE UNITED STATES PROBATION  
21 OFFICE FOR A PREPARATION -- FOR A PRESENTENCE REPORT.

22 WHEN WOULD YOU LIKE THE SENTENCING?

23 MS. ARLIDGE: YOUR HONOR, WE'D LIKE TO DELAY THE  
24 REFERRAL AND ASK FOR A STATUS DATE, AND WE WERE LOOKING AT  
25 MARCH OR APRIL IF THAT'S AGREEABLE WITH THE COURT.

1 THE COURT: THAT'S FINE. DID YOU HAVE A SPECIFIC  
2 DATE IN MIND?

3 MS. KNIGHT: WE DON'T HAVE A SPECIFIC DATE. WHAT  
4 WORKS FOR --

5 MS. ARLIDGE: ANY DATE, YOUR HONOR, THAT THE COURT  
6 FINDS AVAILABLE.

7 THE CLERK: YOU SAID MARCH OR APRIL?

8 MS. ARLIDGE: YES.

9 THE CLERK: I DON'T KNOW THAT WE HAVE A LOT OF  
10 AVAILABILITY.

11 MS. KNIGHT: YOUR HONOR, COULD WE HAVE, IF POSSIBLE,  
12 MARCH 25TH? MS. ROONEY AND I MIGHT BE IN TRIAL BEFORE  
13 JUDGE FREEMAN IN MARCH. IF THAT'S ACCEPTABLE?

14 MS. ARLIDGE: THAT'S FINE, YOUR HONOR.

15 THE CLERK: YOUR HONOR MIGHT NOT BE AVAILABLE  
16 MARCH 25TH.

17 MS. KNIGHT: OH, OKAY.

18 MS. ARLIDGE: WE HAD A PRETRIAL CONFERENCE SET ON  
19 THAT DATE.

20 THE COURT: MARCH 25TH IS THE PRETRIAL CONFERENCE.  
21 IS THAT THE DATE YOU'D LIKE TO KEEP?

22 MS. ARLIDGE: THAT WOULD BE FINE IF THAT WORKS FOR  
23 YOU.

24 THE COURT: WAIT. BUT YOU'RE SAYING -- I'M SORRY, I  
25 WASN'T -- I'M TRYING TO WRITE MY NOTES, SO I COULDN'T KEEP UP

1 WITH EVERYTHING.

2 WHEN IS THE CONFLICT POTENTIALLY?

3 THE CLERK: THAT DAY, ON THE 25TH.

4 THE COURT: OH, OKAY.

5 MS. KNIGHT: MAYBE MARCH 18TH IF THE COURT'S  
6 AVAILABLE.

7 THE CLERK: THAT WORKS FOR THE COURT.

8 THE COURT: OKAY. SO MARCH 18TH, 2020, AT 9:15.

9 MS. ARLIDGE: FOR STATUS.

10 THE COURT: I'M SORRY?

11 MS. ARLIDGE: FOR STATUS.

12 THE COURT: YEAH, FOR STATUS ONLY. I'M NOT MAKING A  
13 REFERRAL TO PROBATION.

14 I AM VACATING THE MAY 1ST TRIAL DATE AND THE MARCH 25TH  
15 PRETRIAL CONFERENCE DATE AND ALL OF THE MARCH FILING DEADLINES  
16 AS TO MR. GLOVER.

17 MS. ARLIDGE: YOUR HONOR, WITH RESPECT TO THAT DATE,  
18 MR. GLOVER RESIDES IN FLORIDA. WE HAVE USED THE COURT CALL IN  
19 THE PAST. WE'D LIKE THE COURT'S PERMISSION TO HAVE MR. GLOVER  
20 APPEAR TELEPHONICALLY ON THAT DATE.

21 THE COURT: YOU NEED TO FOLLOW OUR PROCEDURE, WHICH  
22 IS YOU FILE A REQUEST SEVEN DAYS IN ADVANCE.

23 MS. ARLIDGE: WE'LL DO.

24 MR. JACHIMOWICZ: THANK YOU.

25 THE COURT: ALL RIGHT. ANYTHING MORE FOR MR. GLOVER



1       TODAY?

2               MS. KNIGHT:  NO, YOUR HONOR.  THANK YOU.

3               THE COURT:  NO?  OKAY.  THANK YOU.

4               MR. JACHIMOWICZ:  THANK YOU.

5               THE COURT:  ALL RIGHT.  WE'LL SEE YOU LATER, SIR, IN  
6       2020.

7               (THE PROCEEDINGS WERE CONCLUDED AT 10:23 A.M.)

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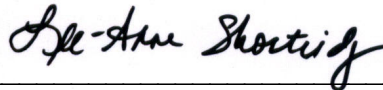
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1  
2  
3 CERTIFICATE OF REPORTER  
4  
5  
6

7 I, THE UNDERSIGNED OFFICIAL COURT REPORTER OF THE UNITED  
8 STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA,  
9 280 SOUTH FIRST STREET, SAN JOSE, CALIFORNIA, DO HEREBY  
10 CERTIFY:

11 THAT THE FOREGOING TRANSCRIPT, CERTIFICATE INCLUSIVE, IS  
12 A CORRECT TRANSCRIPT FROM THE RECORD OF PROCEEDINGS IN THE  
13 ABOVE-ENTITLED MATTER.  
14

15   
16

17 \_\_\_\_\_  
LEE-ANNE SHORTRIDGE, CSR, CRR  
18 CERTIFICATE NUMBER 9595  
19

20 DATED: NOVEMBER 12, 2019  
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